

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Nathan Connolly and Shani Mott,

Plaintiffs,

v.

Shane Lanham, 20/20 Valuations, LLC, and
loanDepot.com, LLC,

Defendants.

Civil Action No. 1:22-cv-02048-SAG

**JOINT MOTION TO EXTEND TIME TO RESPOND TO MOTIONS TO DISMISS AND
FOR AN UPDATED BRIEFING SCHEDULE**

Plaintiffs Nathan Connolly and Shani Mott (“Plaintiffs”) and Defendants Shane Lanham, 20/20 Valuations, LLC, and loanDepot.com, LLC, (“Defendants”) hereby jointly move for an order modifying the existing briefing schedule for responses to Defendants’ motions to dismiss. In support of this motion, the parties respectfully state as follows:

1. On August 15, 2022, Plaintiffs filed a complaint asserting violations of the Fair Housing Act, 42 U.S.C. § 3601 et seq.; the Equal Credit Opportunity Act, 15 U.S.C. § 1691 et seq.; the Civil Rights Act of 1866, 42 U.S.C. §§ 1981, 1982; and Maryland Fair Housing Laws, Md. Code, State Gov’t § 20-702 et seq. ECF 1.
2. On October 28, 2022, Plaintiffs filed an amended complaint, alleging the same violations of law. ECF 25.
3. On November 7, 2022, the parties filed a Joint Motion to Extend Time to Respond to First Amended Complaint and for a Briefing Schedule for Motions to Dismiss, which was granted. ECF 27, 28.

4. On December 12, 2022, Defendants Lanham and 20/20 Valuations, LLC filed a motion to dismiss, ECF 31, and Defendant loanDepot.com, LLC filed a separate motion to dismiss, ECF 32. Per the Court's order, Plaintiffs' oppositions are currently due on January 27, 2023, and Defendants' replies are currently due on February 17, 2023. ECF 28.

5. Plaintiffs respectfully request an additional fourteen days to submit their oppositions to Defendants' motions because multiple attorneys on the team now have a deadline that conflicts with the deadline in this case and cannot be moved, one of Plaintiffs' attorneys began maternity leave earlier than expected, and team members' holiday schedules conflict more than anticipated.

6. Defendants do not oppose this request and ask only that their deadlines for filing replies be extended accordingly, which Plaintiffs do not oppose. The parties therefore request an amended schedule as set forth below.

7. Good cause exists to extend the deadlines for responses to Defendants' motions to dismiss because it will allow the parties to adequately prepare responses to the motions to dismiss and replies thereto.

THEREFORE, the parties respectfully request that the Court set the following deadlines:

- a) Plaintiffs' oppositions to the motions to dismiss are due on February 10, 2023; and
- b) Defendants' replies are due on March 17, 2023.

Dated: December 29, 2022

Respectfully Submitted,

/s/ John Relman
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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of December, 2022, a copy of the foregoing Joint Motion to Extend Time to Respond to Motions to Dismiss and for an Updated Briefing Schedule was filed using the CM/ECF system for the District of Maryland which will send notice to all counsel of record.

/s/ John Relman
John Relman

Attorney for Plaintiffs